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Comment Response Table

Project Title: Ironwood Forest National Monument Travel Management Plan

EA Number: FY13_EA_0033_IFNM_TMIP

Date: 09/05/2014

Comment #	Commenter	Comment	Response	Action Taken
1	ASARCO/SBM	Future mining operations will likely necessitate re-routing of the existing roads.	The likelihood of the re-routing of Silverbell Rd (Red Rock Rd) across non-Monument land in the Little Ranch area was considered in identifying the Monument access routes and this route will not be pursued for improvement.	None.
2	ASARCO/SBM	The need for any necessary access agreements with private landowners should be acknowledged prior to finalization of the Travel Management Plan.	<p>Travel management designations do not apply to routes on non-BLM lands, unless provided for under cooperative agreements, easements, ROWs or other legal instrument (TMP EA p. 2)</p> <p>The Proposed Action includes acquisition of legal access across private lands. The decisions from the TMP will guide the priorities for acquisition, and no maintenance will be done on any route prior to obtaining legal access (ROW, easement, or access agreement).</p>	None.
3	ASARCO/SBM	The INFM Proclamation does require that "the Secretary of the Interior shall prepare a transportation plan" but that Proclamation does not require a separate travel plan. The final RMP has an entire	The TMP includes transportation and travel management decisions. The travel management decisions regulate the use of motorized vehicles. The transportation plan identifies the type of transportation	None.

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		separate subchapter 2.2.17 (pp 75-81) covering travel and route management in the IFNM. That subchapter does satisfy that requirement of the Proclamation for travel management on an ad hoc basis without the unpredictable costs and time involve in carrying out a separate plan.	assets (Roads, Primitive Roads, and Trails) and the maintenance intensity and maintenance standard.	
4	ASARCO/SBM	Another related defect in the TM Plan Documents is the ignoring of what costs would be necessary to administer the Plan. At p. 37 of the Plan, it is stated only that it is assumed that "BLM will have sufficient funding to implement this plan". And Appendix 0 to the Plan states only that "Funding will be needed to implement the actions proposed in the TMP", but nowhere is an estimated amount of that required funding or costs identified.	The BLM develops plans to resolve issues and identify objectives and necessary actions to achieve those objectives. The BLM identifies implementation cost through strategic budget planning and executes actions through the annual work plan process. Strategic budget and annual work planning follow the decisions made in plans and includes cost estimating and scheduling.	None.
5	ASARCO/SBM	It does not make logical sense, as well as being contrary to legally required analyses, for BLM to adopt such a detailed and enforceable travel management plan without knowing, considering and informing the public of what will be the estimated costs of implementing and administering such a detailed Plan. As stated in CEQ's 40 Most Asked Questions regarding environmental analyses: "Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable".	Based on strategic and annual work plan funding requests, the BLM receives appropriations to accomplish work. Work identified in plan decisions is prioritized based on funds appropriated. The BLM will pursue partnerships, grants, and contributions to leverage available funds and implement plan decisions.	None.
6	ASARCO/SBM	As stated above, the IFNM surrounds Asarco's Silverbell Mine on three sides and Asarco holds many valid unpatented	Asarco holds mining claims which predated the Monument designation. Validity examinations are yet to be	None.

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		mining claims within the IFNM.	performed in accordance with 43 CFR 3809.	
7	ASARCO/SBM	Nevertheless, the Plan appears to disregard the need for access to mining claims and mine developments within and through the IFNM with the only exception being in Appendix B recognizing a right of access to unpatented mining claims.	Access needs related to existing mining claims were considered in developing the travel management designations and will be accommodated according to the mining regulations.	Added section 3.7.3.
8	ASARCO/SBM	1. Page 4 of the Plan contains a chart of "Land Ownership in the Ironwood Forest National Monument" showing BLM lands but not showing ownership of Asarco's mining claims.	Map 5.0 shows the existing mining claims in the Monument but BLM does not normally identify the claim holders in plans such as this. Mining claim holder information is available in mining claim reports.	None.
9	ASARCO/SBM	2. Page 12 of the Plan refers to "mineral materials operators, grazing permittees and utility companies" as having "access routes related to the authorizations" but does not recognize that owners of mining claims do have rights of access to those mining claims.	Access rights related to mining claims is alluded to but not specifically described.	Added text to specifically describe access to mining claims.
10	ASARCO/SBM	3. At page 29 of the Plan, reference is made to accessing "an area of known high resource values (cultural, vegetation, biological, visual, recreation setting, other)" but ignores mining and mineral development of known mineral deposits as areas "of known high resource values".	Mining and mineral development were included as part of "other". Receipt of a mining plan of operation would result in priority being given to addressing mining claim access needs.	Added sentence to p.29 specifically addressing mining claims.
11	ASARCO/SBM	4. At page 37, it is stated that resources of "energy and minerals ... were eliminated from detailed analysis as those "resources are not present or are not affected by the proposed action or alternatives in this EA". As set forth above, this statement is patently incorrect because mineral resources are both	The presence of energy and minerals resources were acknowledged but were not analyzed in detail because access would be accommodated to the existing mining claims in accordance with mining regulations.	Included explanation to address this concern in 3.7.2.

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		present and would be affected by the proposed action.		
12	ASARCO/SBM	5. A Section 8.11 should be added to analyze the impacts the Plan would have on the development of mineral resources in and around the IFNM.	See response to comment #11 above.	Clarified in inserted text (section 3.7.2).
13	Pinal County	Given the fact that a portion of the IFNM is located in Pinal County and the proposed Travel Management Plan (TMP) identifies Pinal County roadways as access points, it is poor planning protocol for Pinal County not to be a member of the planning stakeholder group. This fact should be noted in the report and/or Pinal County should be removed from Section 9.0 "Consultation and Coordination".		Removed Pinal County from section 9.0.
14	Pinal County	There are several places where the Federal Lands Access Program (FLAP) is mentioned as a possible funding source. It is unclear at this time if that funding opportunity still exists, this should be fully examined and clarified throughout the document.	FLAP is a Federal Highways Administration funding program which may or may not be funded in the future. Federal Highways Administration funding may be available in future appropriations, in which case BLM would pursue that opportunity with local counties.	Generalized throughout text.
15	Pinal County	Due to the significant amount of "non-mechanized" trails identified in the Preferred Alternative, it is suggested that BLM include further outreach with cyclists and cycling groups in southern and central Arizona.	BLM will be working with various user groups in implementing these decisions and if adjustments are necessary based on emerging demands adaptive measures can be used.	Given public comments received, we have re-examined the route designations in the Sawtooth Mountains and identified administrative vehicle access purposes on two routes related to an inactive mine and the need to control and maintain the Monument boundary. These routes will be maintained according to the guidelines for Primitive Roads, as described in Appendix H of the TMP, and

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				will be available for public non-motorized mechanized use (including bicycles), and motorized use will be for administrative purposes only.
16	Pinal County	The proposed Northern access route presents several very costly and problematic areas that will be difficult to overcome. Pinal County only has right of way on a portion of the approximate 22 mile route.	The Northern route (Harmon Road from Sunland Gin Road to the Sawtooth Mountains) presents engineering challenges to compensate for soil conditions and provide a safe low water crossing at Greene Wash and address Right-of-Way issues. It is an important access route to that part of the Monument and the BLM will pursue long term improvements.	None.
17	Pinal County	The majority of identified roads such as Curtis, Baumgartner, and Cripple Creek are located on State land and could cost hundreds of thousands of dollars to acquire not including the construction costs.	No action is proposed on these routes (Curtis, Baumgartner, Cripple Creek, and others shown on Map 5.0 between Sasco Road and Sunland Gin Road). These routes were highlighted for use by BLM personnel to access the Sawtooth Mountains from Sasco Road.	Final map highlights all county roads, rather than just these few routes.
18	Pinal County	The Northern route also has a CAP crossing and potential flooding concerns near the Santa Cruz River and Greene Canal.	No action is proposed on this route.	None. See action for comment #17.
19	Pinal County	The Sasco Road low water crossing at the Santa Cruz would require a significant investment to resolve including a bridge installation that could cost several Million dollars.	This is an important Monument access route. The BLM will pursue funding sources for long term improvements with Pinal County.	None.
20	Pinal County	Given the low traffic volumes and major waterways it is going to be difficult to support enhancements to the proposed access.	The Federal Highways Administration demonstrated a commitment to funding transportation needs for roads that are important for access to public lands such as the IFNM even when they are not the	None.

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			highest priority for the County transportation plan.	
21	Pinal County	The report is inconsistent in identifying non-motorized trails. Table 1 lists the inventory of non-motorized trails at 90 miles. A non-motorized trail would include cyclists, but in Table 3, only equestrians and hikers are identified. This inconsistency is repeated throughout the EA document. (Sec 3.1.1, 3.13, and others)	<p>The allowable uses for routes designated as trails is restricted by the Monument Proclamation which states: “For the purpose of protecting the objects identified above, the Secretary of the Interior shall prohibit all motorized and mechanized vehicle use off road, except for emergency or authorized administrative purposes.” The Monument Proclamation is an Executive Order that carries the weight of law. Thus, only non-motorized, non-mechanized use can be allowed on routes officially designated as Trails within the Monument.</p> <p>AA-139: Manage non-motorized, mechanized recreational activities according to the BLM’s National Mountain Biking Strategic Action Plan (IFNM ARMP & ROD p. 74).</p> <p>Mechanized Travel: Moving by means of mechanical devices such as a bicycle; not powered by a motor (IFNM ARMP & ROD p. 96).</p>	Added glossary with definitions of mechanized, non-motorized non-mechanized, bicycle, etc.
22	Pinal County	It appears that the preferred alternative is suggesting that over 27% (90 miles) of transportation routes be “non-mechanized”. This would include a great majority of the designated routes in Pinal County. A non- mechanized designation is similar to a “wilderness area” designation. Yet in Map 10.8, BLM has identified only	<p>Decisions on route designations were made concurrently with the land use allocations in the RMP in February 2013 after consideration of a range of alternatives in the Draft RMP/EIS (2007) and Proposed RMP/EIS (2011).</p> <p>Public input was received and considered</p>	Added glossary.

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		a small portion of the monument (West Silverbell Mountains) as having wilderness characteristics. Pinal County requests that only trails within the Wilderness Characteristic area identified in map 10.8 be “non-mechanized”. All other trails should be classified as “non-motorized. This would allow historical trail uses to continue and the monument objectives to be met. Additionally all maps and related references to trails, non-motorized and non-mechanized should be changed to reflect this use.	in the route designation decisions. The purpose of the current proposed action is to identify the on-the-ground work and related management actions to implement those designations.	
23	Pinal County	In section 2.3 the Sasco trail is identified as a potential trail to be nominated for inclusion in the state trails plan. First, the nomination would be for inclusion into the state trails “system”. Second, BLM should also evaluate all trails within the TMP for nomination and inclusion into the state trails system.	BLM will work with Arizona State Parks on any trail system designations to pursue funding through state grants.	None.
24	Pinal County	In all instances of the use of the term “mountain bicycle”, we would suggest changing that to “bicycle”.		Changed “mountain bicycle” to “bicycle” throughout the document. Added definition of “bicycle” to glossary.
25	Pinal County	BLM should consider adding text which identifies the potential linkages to the Anza National Historic Trail corridor as outlined in the Pinal County Comprehensive Plan. http://www.pinalcountyz.gov/Departments/PlanningDevelopment/ComprehensivePlanUpdate/Document/s/00%20Comprehensive%20Plan%20201	The Anza Trail lies near the IFNM. It crosses several designated trail routes that are included in the trail plans of Pinal County, Pima County, and the Town of Marana. Some of these trails provide connections to the Monument. At the time these trail systems are developed, the BLM will coordinate with the counties and the town on the potential connections	Added section 3.17 “Monument Linkages and Connections with Local Trail Systems” and map 3.16 “Local Trail Systems and Links to Monument” including link to Anza Trail.

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		3.pdf	to the Monument.	
26	Grazing lessee	Primarily we requested that necessary existing access to existing ranching infrastructure on the Morningstar, Little Ranch, Tejon Pass grazing allotments remain open at least to "administrative" access by the allotment permittee (individual named) and to other people who help him maintain his ranching operation, including ourselves, as we may be called upon from time to time to fill water tanks or make emergency repairs, or for other tasks.	The route designations established concurrently with the RMP accommodate administrative access for the use, maintenance, and operation of range improvements. The current Proposed Action identifies the need for gates to restrict public vehicle use on administrative routes.	None.
27	IMBA	1. Will any existing legal system trails be closed to mountain bikes?	Route designation decisions made concurrently with the RMP established the legal system of trails for the Monument. Due to the language of the Monument Proclamation, mechanized use (including bicycles) is not allowed off roads, and trails, by definition, are not roads. See response to comment 21.	None.
28	IMBA	2. Will any non-system trails be closed to mountain bikes?	Under the route designations all bicycles are allowed on designated Roads and Primitive Roads (including Administrative Primitive Roads, which are closed to public motorized use).	None.
29	IMBA	3. Are there opportunities to build new trails?	The RMP does provide for adaptive measures in response to emerging needs or issues affecting Monument objects which may include construction of new routes. Construction of any new route requires authorization from BLM. Due to the constraints in language of the Proclamation, any new trails would not be	See action for comment #15.

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			available for mechanized use (including bicycles). Any new administrative vehicle routes or roads would be available for mechanized use (including bicycles).	
30	IMBA	We object to the lack of science and overbroad reading of the IFNM Proclamation in precluding bicycles from all trails in the Travel Management Plan.	Route designations were developed through a route evaluation process which applied a comprehensive set of criteria for compatibility and avoidance to protect Monument objects and accommodate access for allowable land uses. The criteria and procedure for this analysis are described and shown on maps in the Draft RMP/EIS (2007) and Proposed RMP/EIS (2011). See responses to comments #15, #21 and #29.	None.
31	IMBA	A well marked a clear system of trails can accomplish this objective (protecting Monument objects) by keeping all users on identified routes that avoid cultural sites, critical habitat and environmentally sensitive areas.	See response to comment #30	
32	ASLD	does the TMP allow access for bicycles?	Under the route designations bicycles are allowed on designated Roads and Primitive Roads (including Administrative Primitive Roads, which are closed to public motorized use).	Added definition of bicycles.
33	2 individuals	I wonder why equestrian use is allowed on Trails - Non-Motorized (90 Miles), but not bicycle/MTB on the trails? If this is an issue with safety I could understand, but it seems more like a hasty decision to close up to 90 miles of trails that historically have been open for multi-uses including biking and hiking.	The language of the Monument Proclamation states that mechanized use (including bicycles) is not allowed off roads, and trails by definition are not roads. See response to comment #21.	None.
34	Individual	Please work with the mountain biking	Under the Proposed Action, the strategies	None.

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		community to identify and address concerns without excluding access. I am sure there are opportunities for compromise so that this can be achieved.	for implementing the TMP include working with user groups including the cycling community.	
35	Individual	I believe the proposal is unfairly targeting a low-impact mode of recreational travel that should be preserved.	Opportunities for this mode of travel are preserved on designated routes in a variety of settings throughout the Monument.	None.
36	Individual	Visitor information should include an easily read map specifically oriented to motor vehicle use. To avoid clutter the motor vehicle use map should have less detail than Map 10.9, and possibly not include all of the trails and administrative access roads.	Visitor information materials will be produced and your suggestion regarding level of detail in maps will be considered.	None.
37	Individual	This could be a new issue to be considered under section 3.14. It pertains to vehicular operations immediately adjacent to the travel way of roads. It would apply to parking for all categories of roads, and to passing and turnaround maneuvers on the narrower primitive roads. One factor would be the maximum allowable distance from the road. For example, the Coconino NF states the following: "Forest visitors may park within 30 feet of any designated road's edge and camp anywhere on National Forest System lands, except where specifically prohibited. When parking along a designated road, drivers must pull off the traveled portion of the roadway to permit the safe passage of traffic." Other factors include signing indicating where such travel would be allowed or prohibited, and reduction of	The guidelines for passing and turnaround maneuvers on the narrower Primitive Roads are described in the maintenance guidelines for Primitive Roads in Appendix E on page E-7 & E-8.	None.

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		damage to vegetation, soil, and other natural resources		
38	Individual	Bicycles should be allowed on non-motorized trails.	The language of the Monument Proclamation states that mechanized use (including bicycles) is not allowed off roads, and trails by definition are not roads. See response to comment #21.	None.
39	Individual	Let's live up to the Mission Statement where public lands [are] for the use and enjoyment of present and future generations. Please quit restricting the use of Mountain Bikes on trails.	The NLCS units are special areas have a different more refined mission statement.	Added NLCS mission statement.
40	Anonymous	I'm concerned about the use of the word "mechanized" -specifically that bicycles might be considered "mechanized."	By their nature, bicycles are mechanized vehicles. They are not "motorized". Wheels, gears, levers, pulleys, cams etc. are all manufactured mechanisms.	Added glossary including "mechanized".
41	Individual	It's been proven many times over, and we (mountain bicyclists) bring money into the local economy more than 10x the horse riding community.	Socio-economic impacts of mechanized use in the IFNM were analyzed in the PRMP/FEIS p. 4-131.	None.
42	AGFD	Page 11 of the Plan states trails "will be managed to accommodate non-mechanized non-motorized use year round (ie hiking and equestrian). Appendix E page E-10 states "trails are not intended to accommodate mountain bicycles, which are required to stay on designated roads and administrative roads by the Monument Proclamation", yet page E-2 provides the BLM definition of a trail as "linear route managed for human-powered, stock, or off-highway vehicle forms of recreation."	The definition of trail in Appendix E is the standard definition BLM-wide from the Roads and Trails Terminology Technical Note 422, November 2006, U.S. Department of the Interior, Bureau of Land Management, Washington D.C. 20240. The language of the IFNM Proclamation constrains this BLM-wide definition.	Clarifying text added to TMP, Appendix E and term "trail" included in glossary, showing that "trail" in the Monument is defined differently than BLM-wide.
43	AGFD	Section 3.13, Non-mechanized non-motorized uses refers to bicycles as non-mechanized, and as mechanized	Thank you, corrected.	Section 3.13 revised, Section 3.14 added.

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44	AGFD	BLM should add the game carrier section to all sections of the plan pertaining to trail use.		Added to Section 3.1.2; game carrier/game cart included in Glossary.
45	AGFD	The Department suggests inclusion of a simple table designation authorized uses of the various access route types (example provided).	The example provided is a good starting point for educational and visitor information materials.	None.
46	AGFD	To avoid confusion by campers on the Monument, we suggest the BLM consider discontinuing the use of the term “dispersed” when referring to recreation sites and campsite. Designated campsites do not fit (the USFS and BLM-wide) definitions of “dispersed”.		Changed to Designated Camping Sites and defined the different types of sites. (Sections 3.4, 4.1.2, 7.1, 7.2, 8.0).
47	AGFD	Allowing pedestrian and equestrian access without any trail maintenance (on closed routes) will likely lead to trail degradation or, at best, simply not allow natural recovery of the route.	Routes designated concurrently with the RMP as “closed” will be decommissioned, thus becoming off-road. Off-road areas of the Monument are open to pedestrian and stock-riding (equestrian) use. Overall use is expected to be low. The decommissioning process will include stabilization of erosion and other issues. Decommissioned routes will be monitored and adaptive management applied as needed.	None.
48	AGFD	The Department suggests incorporation of Recreation Management Zone (RMZ) information in tabular form (example provided).	Route designations and Recreation Management Zones are not part of the decision in this EA. The example provided is a good starting point for educational and visitor information materials.	None.
49	AGFD	To avoid confusion by trail users, BLM should clarify which routes are to be completely closed and restored, and which routes will be closed to motorized, mechanized use but will still	Decommissioned closed routes will not be shown on public maps. Barriers and signs will be placed at access points. Trails will be shown on public maps, and will be posted at access points.	None.

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		be available for hiking and equestrian use.		
50	AGFD	Editorial comments		Suggested editorial changes were made.